

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

RHONDA BURNETT, JEROD BREIT,  
HOLLEE ELLIS, FRANCES HARVEY, and  
JEREMY KEEL, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF  
REALTORS, REALOGY HOLDINGS  
CORP., HOMESERVICES OF AMERICA,  
INC., BHH AFFILIATES, LLC, HSF  
AFFILIATES, LLC, RE/MAX LLC, and  
KELLER WILLIAMS REALTY, INC.,

Defendants.

Case No. 19-CV-00332-SRB

**DECLARATION OF JENIFER C. WALLIS IN SUPPORT OF THE AGENCY AND  
BROWN HARRIS STEVENS' SUGGESTIONS AND RESPONSE TO ROBERT  
FRIEDMAN (DOC. 1560) AND MONTY MARCH (1562) OBJECTIONS TO THE  
PROPOSED NATIONAL CLASS ACTION SETTLEMENT**

1. I am not a party in the above-titled action. I am over the age of 18 and have personal knowledge of the following facts, except for matters stated on information and belief, and as to those matters, I am informed and believe them to be true. If called upon as a witness, I could and would competently testify to the information stated herein.

2. I am a partner in the firm of Munck Wilson Mandala, LLP and an attorney licensed to practice law in the State of California. I am counsel of record for The Agency<sup>1</sup>. I am admitted *pro hac vice* in this matter.

3. I submit this declaration in support of The Agency and Brown Harris Stevens' Suggestions and Response to Robert Friedman (Doc. 1560) and Monty March (1562) Objections to the Proposed National Class Action Settlement.

4. Attached as **Exhibit A** is a true and correct copy of Suggestions in Support of Final Approval of the Settling Defendants' Class Settlements in *Gibson, et al. v. The National Association of Realtors, et al.*, 4:23-cv-788-SRB (the *Gibson* action) (Doc. 522).

5. Attached as **Exhibit B** is a true and correct copy of the Court's, November 4, 2024 Final Approval Order in the *Gibson* action (Doc. 530).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21<sup>st</sup> day of November, 2024 in Los Angeles, California.

/s/ Jenifer C. Wallis  
Jenifer C. Wallis

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<sup>1</sup> RealTech Holdings, Inc., Suitey, Inc. dba The Agency, The Agency IP Holding Co., LLC, UMRO Realty Corp dba The Agency, and The Agency Real Estate Franchising, LLC are hereinafter collectively referred to as "The Agency".